

REMARKS

Claims 4 and 5 are amended to be independent claims. The subject matter of independent claim 1 and intervening dependent claim 3 are incorporated into both claims 4 and 5. Claims 1 and 3 are canceled.

Claims 2 and 6 – 16, drawn to non-elected species, are canceled without prejudice.

The rejection of claims 4 and 5 under 35 USC 103(a) over McDonald, US Patent 5,066,168, is respectfully traversed. The rejection over McDonald is improper because McDonald fails to describe or suggest all of the elements of the claimed invention. Additionally, modifying McDonald to arrive at the claimed invention would render McDonald unsuitable for its stated purpose. As a result, the Office Action fails to provide the prima facie case of obviousness required for a rejection under 35 USC 103(a).

The claimed invention requires a liquid crystal display for generating a display light of information and a laminate of first and second $\lambda/4$ films. The laminate is configured on the display panel of the liquid crystal display so that display light is changed into S-polarized light or P-polarized light and that said S-polarized light or said P-polarized light is incident on said transparent plate. Additionally, claim 4 requires orienting the $\lambda/4$ films so that the display light is S-polarized light, while claim 5 requires orienting the $\lambda/4$ films so that the display light is P-polarized light. This S-polarized or P-polarized light is then incident on a transparent plate.

As stated in the Summary of the Invention on page 3, lines 16 - 29, an object of the claimed invention is to provide a heads-up display system that prevents double image formation. This is achieved according to the claimed invention by causing the display light that is incident on the transparent plate to be S-polarized or P-polarized light.

As an initial matter, McDonald does not describe or suggest having a display light that is either S-polarized or P-polarized relative to the transparent plate surface, as required by the claimed invention. McDonald describes a polarized display device with contrast enhancement. McDonald notes that at Col. 3, lines 51 – 61 that imaging illumination can have a different linear polarization than the source polarization. However, McDonald does not describe or suggest that S-polarized or P-polarized light relative to a transparent surface should be used. Additionally, McDonald does not suggest that any advantage exists in selecting the linear polarized light to be S-polarized or P-polarized relative to the transparent surface. Thus, in addition to not describing or suggesting all of the features of the claimed invention, McDonald further fails to provide any motivation for modifying the teachings of McDonald to arrive at the claimed invention. Claims 4 and 5 are therefore patentable over McDonald for at least this reason.

Additionally, modifying McDonald to arrive at the claimed invention would render McDonald unsuitable for its stated purpose. The abstract of McDonald states, "Contrast enhancement is achieved by the circular polarizer

which functions to block ambient light reflected from the front element of the imaging elements as a result of transmission through the circular polarizer.”

Similarly, the Summary of the Invention states at Col. 1, lines 49 – 57,

Ambient light incident on the circular polarizer is absorptively filtered so that the light that passes through to the front element of the imaging means (e.g., a screen or lens) is substantially of the first circular polarization. Pursuant to reflection from the front element of the imaging means, the circular polarization of such ambient light is reversed to be that of a second circular orientation, which is substantially blocked by the quarter-wave retarder of the circular polarizer.

The above statements make it clear that McDonald is concerned about preventing reflections from an imaging element, such as lens 117 in Figure 3. Thus, as an initial matter, any laminate formed McDonald also describes application of polarized display device to a heads-up display application in Figure 3 and the associated text at Col. 4, lines 5 – 34. At Col. 4, lines 24 – 28, McDonald states,

As shown in the above statements, one of the stated goals of McDonald is to eliminate reflections from an imaging element, such as a screen or lens. Thus, any laminate formed based on the teaching of McDonald would need to include such a screen or lens. If the imaging element is not included, there would be no reflections to eliminate and the stated purpose of McDonald would be rendered moot. However, the claimed invention requires a laminate of first and second $\lambda/4$ films configured on a liquid crystal display. There is no intervening structure between the first $\lambda/4$ film, the second $\lambda/4$ film, and the liquid crystal display. Because McDonald must include an imaging element between the first and

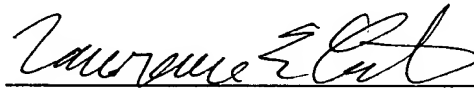
second 1/4 films, while the claimed invention requires that no such element exists, McDonald cannot be operably modified to arrive at the claimed invention. For at least the above reasons, reconsideration and withdrawal of the rejection are respectfully requested.

In view of the foregoing amendments and remarks, the application is respectfully submitted to be in condition for allowance, and prompt, favorable action thereon is earnestly solicited.

If there are any questions regarding this amendment or the application in general, a telephone call to the undersigned would be appreciated since this should expedite the prosecution of the application for all concerned.

If necessary to effect a timely response, this paper should be considered as a petition for an Extension of Time sufficient to effect a timely response, and please charge any deficiency in fees or credit any overpayments to Deposit Account No. 05-1323 (Docket #038788.50290).

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Lawrence E. Carter", written over a horizontal line.

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